



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh Street, S.W.
Washington, D.C. 20590

MAY 2 2001

Mr. Aris Antoniou
Gold Inspection Service, Inc.
P.O. Box 5638
Kingwood, TX 77325

Reference No. 00-0315

Dear Mr. Antoniou:

This is in response to your facsimile to Mr. Charles Hochman and subsequent telephone conversation with Mr. Stanley Staniszewski of our Office of Hazardous Materials Technology. You asked if a fillet-welded patch may be used on the head or shell of a DOT Specification IM portable tank.

We do not consider a fillet-welded patch an acceptable alteration or repair to the head, shell or any pressure containing part of an IM portable tank. This decision is consistent with the application of the National Board of Boiler and Pressure Vessel Inspectors, National Board Inspection Code (NBIC) interpretations NBI 93-2 and NBI 95-6.

As you correctly pointed out in your facsimile, IM portable tanks are designed and constructed to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), but are not required to be stamped as such under the requirements of 49 CFR Part 178, Subpart H. You are also correct in your statement that the U.S. Department of Transportation is the jurisdictional authority referred to in both the ASME Code for new construction and the NBIC for the repair or alteration of pressure vessels used to transport hazardous materials.

I hope this satisfies your request. If you have further questions, please contact us.

Sincerely,

Hattie L. Mitchell
Chief, Regulatory Review and Reinvention
Office of Hazardous Materials Standards



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178.225-13



**GOLD
INSPECTION
SERVICE INC.**

Edmonson
§ 178.255-13
FACSIMILE Repairs
00-0315

To:	RSPA, US Dept. of Transportation	From:	Aris Antoniou
Attn.:	Mr. Charles Hochman	Tel:	281 913 8382
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Date:	28 August 2000	No. of pages:	6

Subject: repairs/alterations to IM portable tanks

Dear Mr. Hochman,

At new construction, IM portable tanks are designed and constructed but not stamped to the ASME Code. For in-service matters such as repairs and alterations, the US DOT is the jurisdictional authority. As such, we would like to inquire of you if a fillet-welded overlapping patch on the head (or shell) of an IM portable tank is considered acceptable. Please refer to the attached sketch for an illustration of the proposed repair or alteration. In reaching your decision, you may wish to consider the joint efficiency required by the ASME Code (Table UW-12 and Fig. UW-3) for a Category A, Weld Type 4 joint and NBIC interpretations NBI 93-2 and 95-6.

Sincerely, Aris Antoniou.